



STATE OF UTAH
NATURAL RESOURCES
Oil, Gas & Mining

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May 9, 1984

Mr. Niels Haubold
UMETCO (Union Carbide)
P. O. Box 1029
Grand Junction, Colorado 81501

RE: Division Concerns for the
Revised Permitting of the
Utah UMETCO (Union Carbide)
Mines
LaSal-Snowball--ACT/037/026
Redd Block Four--ACT/037/046
Hecla Shaft--ACT/037/043
Wilson-Silverbell--ACT/037/027
Deremo--ACT/037/025
San Juan County, Utah

Dear Mr. Haubold:

Thank you for meeting with Division staff for the combined tour of UMETCO's mining operations in Utah on April 10, 1984. From the discussions at the minesites, Ron Dehollander, Rich Miller and yourself should have a good idea of the general issues with which the Division is concerned regarding interim stabilization measures. However, so that all parties are aware of the specific items and the extent to which action may be required by UMETCO, the areas of concern for each minesite are listed in this letter. A response to each area, including a plan and timetable for resolution of the problem should be returned to the Division as soon as possible.

As mentioned in your LaSal office, it is the Division's intention to proceed with surety arrangements after these items are addressed, but no later than July 1984. This will entail a staff presentation to the Board of Oil, Gas and Mining at their monthly meeting, usually held on the fourth Thursday. Scheduling of this presentation needs to be accomplished by the end of the first week of the same month as the meeting.

1. LaSal-Snowball Mine

- 1.1 The area along the eastern perimeter of the LaSal Mine has been recently regraded. The topsoil storage area(s) appear to be in good shape. The recently constructed diversion is beginning to show some signs of erosion. Some form of channel lining should be implemented in those critical channel sections before significant erosion results. Consolidation of the remaining debris on the waste rock piles should complete the interim reclamation of this area. It is the Division's understanding that this material will be buried in a centralized cut being made in the waste rock piles which was actively occurring during the inspection. Is this observation correct?
- 1.2 A section of the western edge of the Snowball Mine area waste rock pile was slumping and eroding due to excessive pad runoff and slope steepness. Regrading and/or riprapping of the drainage should prevent this from continuing. What are the company's plans to rectify this situation?
- 1.3 The undisturbed drainage from the head of Snowball Canyon still does not adequately flow in an unrestricted fashion down the west side ditch along the access road. Water currently flows over the road, and is impounded by an excavation below the mine pad. Discussions were held on-site addressing the options available to correct this problem. What interim plans will UMETCO implement to correct the drainage problems and when will the work be accomplished?
- 1.4 The test plots at the Beaver Shaft showed some early signs of growth, however, the access road to the site is eroding in spots allowing waste rock base material to be washed downslope. The construction and maintenance of berms should eliminate this concern. Please submit plans for solution and time for implementation.

2. Redd Block Four

All aspects of the site are in compliance with the Mining and Reclamation Plan (MRP).

3. Hecla Shaft

Four problems exist at this minesite.

- 3.1 The major issue of concern is the unapproved evaporation pond construction. The Division is deferring review and approval of any forthcoming pond designs to the Utah Department of Health, Bureau of Water Pollution Control to alleviate duplication of regulatory requirements. Submission of plans, along with the Bureau of Water Pollution Control's approval, should be made to complete the Division's files. The proposed construction date and a commitment to notify the Division of completion are required to be submitted at this time.

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- 3.1.1 The Division recommends that the mine water evaporation ponds be fenced appropriately to prohibit livestock and wildlife use.
- 3.2 The abandoned mine water discharge pond to the northwest of the main shaft and adjacent to the vent shaft should be reclaimed if no longer needed for operations.
- 3.3 The southern perimeter of the shaft site pad borders a natural drainage. An April 21, 1983 letter from the Division stressed the need to maintain a containment berm at this point to prohibit spills and debris from washing into the drainage. This has not yet been accomplished. Erosion is continuing to occur and trash is accumulating in the drainage. Please regrade the pad and construct the berm as soon as possible indicating in your reply when this will be done.
- 3.4 A pile of trash is present at the base of the western edge of the waste rock pile. This material should be removed and placed in a sanitary landfill. Please indicate where and when this trash will be removed.

Since this situation appears to be a common problem with UMETCO's minesites, an overall disposal plan should be developed and/or a centralized location chosen to eliminate apparent indiscriminate trash disposal practices.

4. Wilson-Silverbell Mine

- 4.1 A concern remains regarding the mine water discharge. Since this is still occurring, samples of the water must be taken and copies of the lab analyses report must be sent to the Bureau of Water Pollution Control (Attention: Mr. Steve McNeal) as well as the Division. In addition, the irrigation pipe which is being used to convey this water appeared blocked and should be cleaned out allowing free flow beyond the waste rock pile to the pond(s).

5. Deremo Mine

Since this operation has impacts in both Colorado and Utah, the Division requests to be notified of all mine plan modifications or technical revisions being submitted to and approved by the Colorado office which may have an effect on Utah interests.

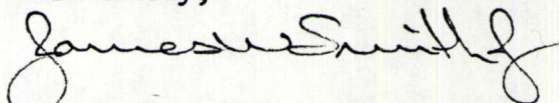
- 5.1 A new commitment concerning UMETCO's plans to dry out, sample, regrade and revegetate the evaporation ponds on either side of the state borderline road should be asserted, if these plans differ from those contained in the February 13, 1984 letter from Bruce Green to

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the Division. A timetable for the operation and a commitment to notify the Division when the work is completed should be submitted to the Division. A notarized letter transferring and accepting eventual liability for these ponds to and by the landowner must also be submitted.

The Division looks forward to the receipt of UMETCO's plans regarding the above concerns. If you have any questions or wish to discuss any plans prior to submission, please feel free to contact Tom Tetting or my staff.

Sincerely,



James W. Smith, Jr.
Administrator
Mineral Resource Development
and Reclamation Program

JWS/TNT:btb

cc: Ron Dehollander, UMETCO
Rocky Beavers, Colorado Bureau of Mined Land Reclamation w/attachment
Steve McNeal, Utah Department of Health
D. Wayne Hedberg, DOGM
T. Tetting, DOGM
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